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35 UNITED STATES DISTRICT COURT
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37 NORTHERN DISTRICT OF CALIFORNIA
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39 DANIEL CISNEROS

40 Plaintiff,

41 vs.

42 VANGILDER, et al.,

43 Defendants.

44 No.: 4:16-cv-00735-HSG

45 **JOINT STIPULATION RE: DEPOSITION
46 OF CAPTAIN D. WILCOX AND ORDER**

47 Judge: Hon. Haywood S. Gilliam Jr.
48 Courtroom: 2
49 Trial Date: January 14, 2019

1 DANIEL MANRIQUEZ

2 Plaintiff,

3 vs.

4 VANGILDER, et al.,

5 Defendants.

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7 No.: 4:16-cv-01320-HSG

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10 **JOINT STIPULATION RE: DEPOSITION
11 OF CAPTAIN D. WILCOX AND ORDER**

12 Judge: Hon. Haywood S. Gilliam Jr.
13 Courtroom: 2
14 Trial Date: January 14, 2019

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16 **JOINT STIPULATION**

17 On July 3, 2018, this Court granted Plaintiffs' Daniel Manriquez and Daniel Cisneros
18 Motion to Amend the Scheduling Order for the sole purpose of allowing Plaintiffs to depose
19 witness Captain C. Parry. *See* ECF 71, 75. Shortly thereafter, Defense counsel has represented
20 that Cpt. Parry was not involved in any way with the incident, CDCR's investigation into the
21 incident, or reviewing the incident report. Rather, Defense counsel has represented that Cpt.
22 Wilcox is the appropriate witness. Based on these representations by Defense counsel, the parties
23 seek to stipulate to the following:

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2 It is STIPULATED, by and between the undersigned counsel for Plaintiffs and Defendants,
3 that non-expert discovery will remain open for the sole purpose of deposing Captain D. Wilcox.
4 Captain C. Parry will not be deposed unless a party seeks an order from this Court. Plaintiffs and
5 Defendants further stipulate that Captain D. Wilcox's deposition will take place on July 27, 2018,
6 and that no further non-expert discovery will be conducted unless otherwise ordered by this
7 Court.

DATED: July 19, 2018

/s/ PreetiBajwa
Preeti Bajwa
Deputy Attorney General
Attorneys for Defendants
S. Cupp, J. Cuske, D. Melton,
K. Ohland, J. Vangilder,
and J. Vasquez.

14 DATED: July 19, 2018

/s/ Britt M. Roberts
Britt M. Roberts
Reed Smith, LLP
Attorney for Plaintiff Daniel Cisneros

DATED: July 19, 2018

/s/ Brody A. McBride
Brody A. McBride
Singleton Law Firm
Attorney for Plaintiff Daniel Manriquez

ORDER

Upon considering the parties' joint stipulation, it is ORDERED that non-expert discovery will remain open for Plaintiffs to conduct Captain D. Wilcox's deposition, which will take place on July 27, 2018. No other non-expert discovery will be conducted.

IT IS SO ORDERED.

35 || DATED: July 19, 2018

Haywood S. Gill Jr.
HON. HAYWOOD S. GILLIAM JR.

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